

AFFIDAVIT OF WILLIAM DEAN DAUGHTRY

1. I am 47 years of age. and have personal knowledge of the following facts. I am legally competent and have personal knowledge of the following facts.
2. I met Stanley Booth sometime in early December of 1988.
3. In my presence Stanley Booth stated that he was contracted to write a story for Esquire Magazine on James Brown.
4. I was present in March of 1990 at T-Birds Lounge in Stone Mountain, Georgia when Stanley Booth announced from the stage, over the public address system that and Jacque Daughtry were collaborating on a story for Esquire Magazine about Jacque Daughtry's relationship with James Brown. Stanley Booth stated in public that the story was due for release in the April 1990 issue of Esquire.
5. I was present on several occasions in 1988 and 1989 when Stanley Booth assured Jacque Daughtry that any profits from the of her relationship with James Brown story, book, movie, or magazine, would be split on a 50/50 basis.
6. I was present April of 1988 at my stepmother's house when Jacque Daughtry was five hours late for a pre-planned dinner. Jacque Daughtry has a reputation for punctuality and I became concerned about her. When she finally arrived at approximately 1:00 a.m. she was disheveled, distraught, and had a look of terror on her face.
7. Jacque Daughtry described a night of terror, with a drugged James Brown at the wheel of a black van.
8. When the book Rythm Oil was published in the United States, I was ashamed to learn from John Rufcamp that there were passages about my wife, Jacque Daughtry and a alleged sexual relationship between her and James Brown.
9. My family are devout Christians, and such a disclosure put a strain on our marriage, and my relationship with my family.
10. My father's family lives in and around Augusta, Georgia, and the disclosure about my wife and James Brown was extremely embarrassing to the entire family.
11. Although I would not describe my family or myself as racists, I have been raised to believe that the races should not mix. The disclosure of a sexual relationship

between my Caucasian wife and a man of African American heritage placed me in an awkward position with my community, my family, and dampened my ardor for my wife. My connubial relationship with Jacque Daughtry declined steadily as a direct result of the strain this revelation put on our marriage.

12. In the late summer of 1992, I was watching television in Atlanta, Georgia with Joe D'lero, my stage manager and sound man, and Jacque Daughtry when Channel 5 new reporter Lisa Clarke reported that my wife had an alleged affair with James Brown. Jacque Daughtry became hysterical and left my home for two days.
13. During the period of 1988-1991, at which time my wife had contracted with Stanley Booth for her story, I paid over Five-Thousand Dollars per year for long distance phone calls for which I was never re-imbursed. Stanley Booth stated in my presence that when the story was released, the profits from the book, movie, or magazine story, would cover the costs of these phone bills. The phone bills were a result of calls made by my wife to Stanley Booth discussing the story of James Brown, and the logistics of getting this story published.
14. During this period I expended an additional \$1000 per year for travel expenses (approximation) to cover Jacque Daughtry's excursions to Augusta, Georgia to meet with Stanley Booth. Stanley Booth made repeated assurances that this money would be re-imbursed when the story was released. Stanley Booth made repeated statements that the release of the story would make Jacque Daughtry and himself wealthy.
15. During the period of 1988-1991 Stanley Booth made repeated statements that the release of a story was imminent about Jacque Daughtry and her relationship with James Brown.
16. During the period of 1988-1991 Stanley Booth and his friends [REDACTED] and two other persons whose names I do not recall, stayed in my home, ate my food, and used my telephone, all without charge to them.
17. My wife has to my knowledge has never drunk alcoholic beverages nor used illegal substances of any kind. Both alcohol and illegal drugs have always been forbidden in my home.
18. In 1991 [REDACTED] moved some boxes into my home. Subsequent to this, my wife began to receive threatening phone calls from a man who identified himself [REDACTED] who

wanted possession of these boxes. [REDACTED] had told me that these boxes contained personal items.

19. I spoke with this man identified as [REDACTED] and demanded that he cease his threats against my wife.
20. I spoke with Stanley Booth by telephone and Booth indicated that he was fearful that [REDACTED] had involved him in a credit card fraud scheme, and that these boxes were evidence of this scheme. Having listened to some of the tapes which were in these boxes, it seemed to me that the conversations were regarding illicit deals between Augusta politicians.
21. From my wife, Jacque Daughtry, I learned that the Federal Bureau of Investigation sent agents to my home to retrieve these boxes.
22. Immediately following this period, my wife related to me that she feared that Stanley Booth had taped her private conversations. We found mysterious holes drilled in our walls near our telephone switches, and light sockets. Our home was only a few months old and I have no knowledge of how these holes came to be in my walls. Also during this period I had suspicions that someone had broken into my home while I was away, and the Snellville police were called to investigate the boot prints around my home. There were traces of sheetrock dust around the holes in the wall and light sockets.
23. In 1991 Stanley Booth came to my house and took pictures of my wife in a Southern Belle gown for an alleged article in Penthouse. To my knowledge no such article was ever forthcoming.
24. At all times relevant to this lawsuit Jacque Daughtry believed that she and Stanley Booth had a contract to write a story about her relationship with James Brown.

FURTHER AFFIANT SAYETH NOT

This the 22 of May, 1994.

William Dean Daughtry
William Dean Daughtry

Sworn to and subscribed before me the
day and year first above written.

Marianne C. Stephens
NOTARY PUBLIC